

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILMINGTON TRUST, NATIONAL ASSOCIATION, AS TRUSTEE OF THE \$29,615,000 PHILADELPHIA AUTHORITY FOR INDUSTRIAL DEVELOPMENT SENIOR HOUSING REVENUE BONDS (THE PAVILION),	:	
	:	
	:	
	:	
	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 2:22-cv-03985-GJP
	:	
v.	:	Judge Gerald J. Pappert
	:	
	:	
PAVILION APARTMENTS PENN LLC,	:	
	:	
	:	
Defendant.	:	
	:	
	:	
	:	
	:	
	:	

DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT

I, Karla M. Vehrs, declare as follows:

1. I am an attorney in the firm of Ballard Spahr LLP, representing plaintiff Wilmington Trust, National Association, as Trustee of the \$29,615,000 Philadelphia Authority for the Industrial Development Senior Housing Revenue Bonds (The Pavilion) (“Wilmington Trust”).

2. Wilmington Trust filed a Complaint in the above-captioned matter on October 6, 2022. Defendant Pavilion Apartments Penn LLC (“Pavilion”) was served with the Complaint and Summons on October 10, 2022, as reflected in the Affidavit of Service (Dkt. No. 11).

3. At least twenty-one days have passed since Pavilion was served.

4. Pavilion has failed to answer or otherwise respond to the Complaint as required by Federal Rule of Civil Procedure 12(a)(1)(A)(i).

5. Pavilion has not sought an extension to answer or otherwise respond to the Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 03, 2022

/s/ Karla M. Vehrs

Karla M. Vehrs (*pro hac vice*)

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*Counsel for Plaintiff Wilmington Trust, National
Association*

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of Plaintiff's foregoing request for entry of default to be served via first-class mail, postage prepaid, upon:

c/o Vcorp Services, LLC/CT Corporation System
600 N. 2nd Street, Suite 401
Harrisburg, PA 17101

Dated: November 03, 2022

/s/ Karla M. Vehrs

Karla M. Vehrs (*pro hac vice*)

*Counsel for Plaintiff Wilmington Trust,
National Association*